

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 4:24-CV-10017-MARTINEZ/SANCHEZ

AKARI JOHNSON and
HAZEL THOMPSON,

Plaintiffs,

vs.

MMI 82, LLC and
THE ENTHUSIAST LLC,

Defendants.

**DECLARATION OF ANTHONY NARULA, ESQ. IN SUPPORT OF JOINT MOTION
TO EXTEND PRETRIAL DEADLINES AND CONTINUE TRIAL**

I, Anthony Narula, hereby declare as follows:

1. My name is Anthony V. Narula. I am over the age of eighteen and have personal knowledge of the facts stated herein.
2. I am a Litigation Partner at Caldera Law PLLC, duly licensed to practice law in the courts of the State of Florida, and admitted to practice in the United States District Court for the Southern District of Florida.
3. On May 2, 2025, Caldera Law substituted in as counsel for Defendants MMI 82, LLC and The Enthusiast LLC. DE 41. I am now the lead counsel for both Defendants.
4. I make this affidavit in support of the Joint Motion to Extend Pretrial Deadlines and Continue Trial.
5. My firm requests an extension of at least 45 days to be able to get up to speed on this matter and prepare for trial.

6. Specifically, my firm needs additional time to review the discovery taken in this matter to date to be able to prepare any pretrial discovery motions.

7. My firm intends to conduct additional discovery in this matter.

8. Specifically, Defendants plan to depose Daniella Rodriguez and Aileen Gonzalez, who both provided declarations in connection with this matter but have not yet been deposed by any party. We are unable to complete this additional discovery by the current discovery deadline of May 17, 2025.

9. This concludes my declaration.

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true to the best of my knowledge and belief.

Dated: May 6, 2025

/s/ Anthony V. Narula, Esq.

Anthony V. Narula, Esq.